

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ALANNA DUNN, REGINALD HAYMON,
ADAM DAY, ERIC ZEIDER, CAMERON
LEONARD, AND JASON WILSON, on
behalf of themselves and others similarly
situated,

Plaintiffs.

v.

CUYAHOGA COUNTY,

Defendant.

Case No. 1:23-cv-00364

Judge Bridget Meehan Brennan

**JOINT MOTION TO INCREASE PAGE LIMITATIONS AND EXTEND DEADLINES
FOR PARTIES' MEMORANDA RELATING TO CLASS CERTIFICATION**

Pursuant to Rule 7.1(d), (e) and (f) of the Local Civil Rules for the United States District Court, Northern District of Ohio, and Sections B and C of this Court's Initial Standing Order (Doc. No. 3), Plaintiffs Alanna Dunn, Reginald Haymon, Adam Day, Eric Zeider, Cameron Leonard and Jason Wilson and Defendant Cuyahoga County (together the "Parties"), by their undersigned counsel, hereby jointly move for leave to: (1) file memoranda relating to Plaintiffs' motion for class certification in excess of the 15-page limit for non-dispositive motions; and (2) extend the Parties' deadlines to file their respective response and reply memoranda relating to class certification by 4 days. In support, the Parties state as follows:

This is a complex, putative class action case filed by six (6) named plaintiffs involving the alleged unconstitutional over-detention of inmates in the Cuyahoga County Correctional Center ("CCCC"). (Doc. No. 39, First Amended Complaint). The parties have engaged in discovery for two years, during which time Defendant and third-parties have collectively produced over 1,456,000 documents, Plaintiff has deposed 13 fact witnesses, and Defendant has deposed 5 of the

named Plaintiffs, with the final named Plaintiff deposition scheduled to take place this week. The Parties have also produced expert reports and deposed one another's respective expert witnesses for class certification.

The Parties jointly request 25 additional pages (40 pages total) for Plaintiff's memoranda in support of class certification and Defendant's response in opposition to class certification, and 5 additional pages (20 pages total) for Plaintiffs' reply in support of class certification.¹ There is good cause for the Court to allow the Parties the additional pages they request. The Parties agree that additional length is necessary to (i) adequately present all of the relevant factual background and evidence about how the Cuyahoga County Sheriff's Department ("CCSD") receives and processes release records for County and Cleveland detainees, (ii) set forth the large volume of evidence that has been compiled and has been subject to extensive discovery in this case, and (iii) fully explain why it is relevant to the commonality, typicality, and adequacy of representation requirements of Fed. R. Civ. P. 23(a) and the ascertainability, predominance, and superiority requirements of Fed. R. Civ. P. 23(b)(3). Indeed, there are significant factual and legal class certification issues in this case that must be fully briefed by both Parties, and thus additional length for the briefing is being requested in order to ensure that each side has a full and fair opportunity to present all of their evidence and arguments in a competent and thorough manner. Accordingly, the Parties jointly request that the Court extend the page limitations in order to ensure that both sides are able to present all of the relevant facts and legal arguments in a comprehensive manner.

In addition, Defendant seeks 4 additional days to file its response in opposition to Plaintiff's motion for class certification. Plaintiffs do not oppose but request the same number of additional days to file their reply in support of their motion. Plaintiffs' motion for class certification is due

¹ The Parties' joint request reflects a compromise reached after cooperative communication concerning their original respective positions about appropriate page limitations.

to be filed on April 17, 2025. With the four day extensions they seek, Defendant's response would be due on May 5, 2025, and Plaintiffs' reply would be due on May 16, 2025.

Respectfully submitted,

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